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February 28, 2019

By Hand and ECF

The Honorable Nicholas G. Garaufis  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.  
Criminal Docket No. 18-204 (S-1) (NGG) (VMS)

Dear Judge Garaufis:

The government respectfully requests an extension until March 11, 2019 to submit an omnibus reply to the defendants' oppositions to the government's motion to admit enterprise evidence, pending before the Court. The government's replies are currently due on Tuesday, March 5, 2019. The government requests this six-day extension due to the individual oppositions filed by each defendant, bringing the length of the combined oppositions to 63 total pages. The government also respectfully requests permission to file an oversized omnibus reply brief of 25 pages. The government contacted all defense counsel yesterday morning seeking their position on this request but received no response.

The government also respectfully requests that the Court set April 15, 2019 as the deadline by which both the government and the defendants will submit their proposed jury charges, exchange witness lists, and exchange trial exhibits, final transcripts and translations. The government has also informed defense counsel that it will begin providing

material pursuant to 18 U.S.C. § 3500 on a rolling basis beginning on April 8, 2019, three weeks prior to trial.

Respectfully submitted,

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cc: Counsel of record (by ECF)  
Clerk of Court (NGG) (by ECF)